

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF RHODE ISLAND**

ALBERT L. GRAY, Administrator, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 04-312-L
	:	
JEFFREY DERDERIAN, et al.,	:	
	:	
Defendants.	:	
ESTATE OF JUDE B. HENAULT, et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 03-483-L
	:	
AMERICAN FOAM CORPORATION,	:	
et al.,	:	
	:	
Defendants.	:	

**DEFENDANT CELOTEX CORPORATION’S MOTION TO APPROVE
“GOOD FAITH” SETTLEMENT IN ACCORDANCE WITH
RHODE ISLAND GENERAL LAWS §§ 10-6-7, 10-6-8**

Pursuant to sections 10-6-7 and 10-6-8 of the Rhode Island General Laws, Defendant Celotex Corporation (“Celotex”) hereby moves this Court for an Order approving Celotex’ gross settlement with Plaintiffs in the amount of \$1,500,000 as a “good faith” settlement, so as to extinguish all potential contribution claims by joint tortfeasors. Court approval of this Motion is one of a number of conditions precedent that have to be satisfied before there is a final binding settlement.

In support of this Motion, Defendant Celotex submits the accompanying Memorandum of Law and Affidavit of Lawrence G. Cetrulo, Esq.

WHEREFORE, Celotex Corporation respectfully requests that the Court enter an Order approving Celotex' gross settlement with Plaintiffs in the amount of \$1,500,000 as a "good faith" settlement, so as to extinguish with prejudice all potential contribution claims by joint tortfeasors.

Respectfully submitted,

CELOTEX CORPORATION

By its Attorneys,

/s/ Lawrence G. Cetrulo

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Date: April 17, 2009

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of April 2009, I caused to be served a copy of the attached Notice, unless otherwise indicated, to the list of counsel of record appended hereto.

/s/ Lawrence G. Cetrulo

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